

# **EXHIBIT B**

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**From:** Schramek, Adam T.  
**Sent:** Tuesday, December 29, 2015 1:56 PM  
**To:** 'Ben Gastel'; Puig, Yvonne K.; Hoffman, Eric; 'chris@gideoncooper.com'; 'Matt H. Cline (matt@gideoncooper.com)'  
**Cc:** Daniel Clayton; Randy Kinnard; George Nolan; Bill Leader; 'Chalos, Mark P. (mchalos@lchb.com)'; Martin, Annika K.; Gerard Stranch  
**Subject:** RE: Depositions of PSC Common Experts

Ben:

It does not make sense to depose someone and then get another report without the opportunity to re-depose him or her. We too plan to have our experts rebut anything yours might say in a reply and likewise will only provide our experts for deposition once. That means none of us will be able to fully depose experts on all opinions and underlying facts until after 1/29. Accordingly, I suggest we start with plaintiffs' experts the first week of February.

Thanks,

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**From:** Ben Gastel [<mailto:beng@bsjfirm.com>]  
**Sent:** Tuesday, December 29, 2015 11:23 AM  
**To:** Puig, Yvonne K.; Schramek, Adam T.; Hoffman, Eric; 'chris@gideoncooper.com'; 'Matt H. Cline (matt@gideoncooper.com)'  
**Cc:** Daniel Clayton; Randy Kinnard; George Nolan; Bill Leader; 'Chalos, Mark P. (mchalos@lchb.com)'; Martin, Annika K.; Gerard Stranch  
**Subject:** Depositions of PSC Common Experts

All,

This email is in response to your request to take the depositions of PSC's common experts disclosed on December 16. Below is the list of attorneys who will be responsible for scheduling the depositions of each expert. On all such communications please continue to include Mark Chalos and me on those communications, but the below lawyers will ultimately be the coordinating attorney for each expert:

Joachimsthaler: Gerard/Ben  
Russo, Kessler: Chalos/Annika Martin  
Baddley, Gray, Dubberke, Winikur, Rauck: Bill Leader/George Nolan  
Dawson/Stephenson: Dan Clayton

Further, to reiterate a point Gerard made yesterday in an email, some of our experts might be used in reply/rebuttal and as a result, we will not agree to produce them following each report. We are happy to produce all of our experts, I just want to make sure that we are all on the same page on this issue.

Ben Gastel  
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**\*\*Please note that our firm changed addresses effective June 29, 2015.**

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